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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, MARIELA
GONZÁLEZ, FREDDY JOSE ARAPE RIVAS,
M.H., CECILIA DANIELA GONZÁLEZ
HERRERA, ALBA CECILIA PURICA
HERNÁNDEZ, E.R., and HENDRINA
VIVAS CASTILLO,

Plaintiffs,

v.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY, and UNITED STATES OF
AMERICA,

Defendants.

Case No. 25-cv-1766

**DECLARATION OF A.V. IN SUPPORT OF
PLAINTIFFS' MOTION TO POSTPONE
EFFECTIVE DATE OF AGENCY ACTION**

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DECLARATION OF A. V.

I, A. V. , declare:

1. I have personal knowledge of the facts set forth in this declaration. If called upon to testify as a witness, I could do so and would testify to these facts.

2. I have lived in the United States since 2023, and I first applied for Temporary Protected Status (TPS) in 2023. As a result of the decision by Secretary of Homeland Security Kristi Noem to terminate TPS for Venezuela, I expect to lose my legal status on April 7, 2025.

3. I am a member of the National TPS Alliance, and joined voluntarily because I believe in the mission of the organization.

4. I am submitting this declaration to describe the harm my family and I have suffered since the announcement of the vacatur of the extension of TPS for Venezuela, and the harm we would suffer if TPS is ultimately terminated.

Background

5. I am 23 years old and live in Alabama. I came to the U.S. on humanitarian parole in March 2023. I have approved TPS. My work permit and my driver's license expire in March 2025, as they are tied to my parole expiration.

6. I was studying medicine in Venezuela, despite enduring severe economic hardship. I often did not have money for the bus, so would walk for more than 40 minutes to get to classes. At times, my family did not have enough money for food, and I frequently experienced hunger. In 2019, government forces shot tear gas cannisters into the university buildings while I was in class. My classmates and I escaped, running for our lives. After that, I did not feel safe to return to the university and I was forced to abandon my studies. I began working in a medical warehouse, to save money so that I could eventually escape Venezuela.

7. Since being in the United States, I have worked very hard to support myself and my family members who remain in Venezuela. I currently work full-time, on the night shift, at an auto parts manufacturer. I have often held a second, part-time job as well.

1 8. I have paid taxes for both years that I have worked in the United States.

2 9. I am studying English with the hope of one day becoming a paramedic.

3 10. I have many family members in the United States, several of whom rely on
4 TPS. My uncle, his wife, and their three-year-old son live in Alabama, near me, and rely
5 on TPS. Another cousin lives nearby with her two U.S. citizen children. She also relies on
6 TPS for protection from deportation and work authorization.

7 **Impact of Temporary Protected Status**

8 11. The economic stability that TPS has afforded me has been transformative. I
9 have been overwhelmed by the feeling of having plentiful food, water, and electricity. I
10 felt like I could breathe for the first time.

11 12. However, as the 2024 presidential election drew near, I began struggling
12 with severe anxiety and fears that I would lose my TPS status and everything that I have
13 worked for. News reports about President Trump's plans to deport all immigrants
14 awakened a deep sense of dread in me, as I am terrified to return to Venezuela.

15 13. I began to experience panic attacks for the first time in my life. In August
16 2024, I suffered a panic attack so intense that I made a terrible mistake. Desperate to quiet
17 my mind and body, I overdosed on allergy medicine. A friend realized what had happened
18 and drove me to the hospital. I was there for two days. After that, I began therapy and
19 antidepressants to help me manage my anxiety over my immigration status and fear of
20 being sent back to Venezuela.

21 **Impact of the Decision to Terminate TPS**

22 14. If TPS is terminated, I will lose my job and my ability to work in the United
23 States. I will not be able to renew my driver's license. I will not be able to afford to pay
24 rent, support myself or send money to my family members in Venezuela who rely on my
25 remittances to purchase food and basic necessities, like medicine for my mother's serious
26 heart condition. I have no other form of immigration relief pending, and TPS is my only
27 protection from deportation.

28 15. I joined the National TPS Alliance (NTSPA) after viewing a webinar on

1 February 12, 2025. I immediately signed up to be a member, believing in the mission of
2 the organization. I also forwarded the information to everyone I could think of who is
3 impacted by the decision to terminate TPS for Venezuela.

4 16. It is important for me to share my story, but, sadly, I am afraid to do so
5 publicly. I am afraid of retaliation from the government for participating in this lawsuit. I
6 am terrified of returning to Venezuela, so I am worried that publicly participating could
7 increase the chance that I would be deported.

8
9 I declare under penalty of perjury that the foregoing is true and correct, and that this
10 declaration was executed at Alabama this 20th day of February, 2025.

11
12 /s/ A.V.
13 A. V.
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CIVIL LOCAL RULE 5.1 ATTESTATION

I hereby attest that I have on file all holographic signatures corresponding to any signatures indicated by a conformed signature (/S/) within this e-filed document.

/s/ Emilou Maclean
Emilou Maclean

I, Emilia Garcia, certify that I am competent to translate from English to Spanish and that the document “DECLARACIÓN OF A.V.” (DECLARATION OF A.V.) is a true and accurate translation of the document from English to Spanish to the best of my knowledge and ability. I declare that this statement is true and accurate, under penalty of perjury, and that his certification was signed in Loomis, California on this day the 20th of February, 2025.

A handwritten signature in black ink, reading "Emilia Garcia". The signature is written in a cursive style with a large, stylized 'E' and 'G'.

Emilia Garcia

DECLARACIÓN DE A. V.

Yo, A. V. , declaro lo siguiente:

1. Tengo conocimiento personal de los hechos establecidos en esta declaración. Si se me solicita que declare como testigo, podría hacerlo y testificaría estos hechos.

2. Vivo en los Estados Unidos desde 2023, y solicité por primera vez el Estatus de Protección Temporal (Temporary Protected Status, TPS) en 2023. Como resultado de la decisión de la Secretaria de Seguridad Nacional, Kristi Noem, de poner fin al TPS para Venezuela, espero perder mi estatus legal el 7 de abril de 2025.

3. Soy miembro de la Alianza Nacional TPS y me uní voluntariamente porque creo en la misión de la organización.

4. Presento esta declaración para describir el daño que mi familia y yo hemos sufrido desde el anuncio de la anulación de la extensión del TPS para Venezuela, y el daño que sufriríamos si el TPS finalmente se termina.

Antecedentes

5. Tengo 23 años y vivo en Alabama. Llegué a los EE. UU. con un permiso humanitario en marzo de 2023. Tengo el TPS aprobado. Mi permiso de trabajo y mi licencia de conducir vencen en marzo de 2025, ya que están vinculados al vencimiento de mi permiso humanitario.

6. Estudiaba medicina en Venezuela, a pesar de soportar graves dificultades económicas. A menudo no tenía dinero para el autobús, así que caminaba más de 40 minutos para llegar a clase. A veces, mi familia no tenía suficiente dinero para comer y yo pasaba hambre con frecuencia. En 2019, las fuerzas gubernamentales dispararon botes de gas lacrimógeno contra los edificios de la universidad mientras yo estaba en clase. Mis compañeros de clase y yo escapamos, corriendo para salvar nuestras vidas. Después de eso, no me sentí seguro para volver a la universidad y me vi obligado a abandonar mis estudios. Empecé a trabajar en un almacén médico para ahorrar dinero y poder escapar de Venezuela.

7. Desde que estoy en Estados Unidos, he trabajado muy duro para mantenerme

1 a mí y a mis familiares que permanecen en Venezuela. Actualmente trabajo a tiempo
2 completo, en el turno de noche, en una fábrica de piezas de automóvil. A menudo he
3 tenido un segundo trabajo a tiempo parcial.

4 8. He pagado impuestos durante los dos años que he trabajado en Estados
5 Unidos.

6 9. Estoy estudiando inglés con la esperanza de convertirme algún día en
7 paramédico.

8 10. Tengo muchos familiares en Estados Unidos, varios de los cuales dependen
9 del TPS. Mi tío, su esposa y su hijo de tres años viven en Alabama, cerca de mí, y
10 dependen del TPS. Otra prima vive cerca con sus dos hijos, ciudadanos estadounidenses.
11 Ella también depende del TPS para protegerse de la deportación y obtener autorización de
12 trabajo.

13 **Impacto de la Condición de protección temporal**

14 11. La estabilidad económica que el TPS me ha proporcionado ha sido
15 transformadora. Me ha emocionado la sensación de tener comida, agua y electricidad en
16 abundancia. Sentí que podía respirar por primera vez.

17 12. Sin embargo, a medida que se acercaban las elecciones presidenciales de
18 2024, comencé a sufrir una ansiedad severa y temores de perder mi estatus de TPS y todo
19 por lo que he trabajado. Las noticias sobre los planes del presidente Trump de deportar a
20 todos los inmigrantes despertaron en mí una profunda sensación de temor, ya que me
21 aterroriza regresar a Venezuela.

22 13. Empecé a sufrir ataques de pánico por primera vez en mi vida. En agosto de
23 2024, sufrí un ataque de pánico tan intenso que cometí un terrible error. Desesperado por
24 calmar mi mente y mi cuerpo, tomé una sobredosis de medicamentos para la alergia. Un
25 amigo se dio cuenta de lo que había pasado y me llevó al hospital. Estuve allí dos días.
26 Después de eso, comencé una terapia y tomé antidepresivos para ayudarme a controlar la
27 ansiedad por mi situación migratoria y el miedo a que me enviaran de vuelta a Venezuela.

28 **Impacto de la decisión de terminar la TPS**

